

August 10, 2021

Document Electronically Filed

Hon. Sarah L. Cave
United States Magistrate Judge
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: Torres v. Commissioner of Social Security
Civil Action No: 1:20-cv-09092-SLC

Dear Judge Cave:

This letter respectfully requests an extension of time of sixty (60) days for Plaintiff to serve her Motion for Judgment on the Pleadings in this matter. Plaintiff's Motion for Judgment on the Pleadings is currently due on August 20, 2021. However, due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met. Plaintiff cannot meet the current briefing deadline. This extension is needed to thoroughly and properly prepare her Motion. Plaintiff's counsel has contacted defense counsel who consents to this request. This would be a first request to extend the time to serve Plaintiff's Motion.

If this request is granted, Plaintiff's Motion for Judgment on the Pleadings will be due on **October 19, 2021**. Subsequently, in accordance with the pattern of the Standing Order, the Commissioner's response to the Motion for Judgment on the Pleadings would then be due **December 20, 2021** (due to the deadline set out in Dkt. No. 5 resulting in a weekend filing deadline). Plaintiff's Reply would then be due **January 10, 2022**.

Thank you for your consideration.

Respectfully submitted,

The requested extension (ECF No. 18) is GRANTED
and the proposed briefing schedule is ADOPTED.

The Clerk of Court is respectfully directed to close
ECF No. 18

/s/ Howard D. Olinsky

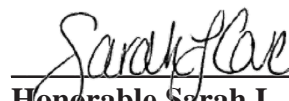
Howard D. Olinsky, Esq.
Bar Code H06529
Counsel for Plaintiff

CC [via ECF]: Susan C. Branagan (Counsel for Defendant)

SO ORDERED.

Dated: 8/11/2021

New York, NY


Honorable Sarah L. Cave
U.S. Magistrate Judge